

REMARKS

Claims 1, 4, 5, 8–13, and 16–18 are pending. In view of the following comments, Applicant respectfully requests favorable consideration and allowance of the claims.

Rejection Under 35 U.S.C. § 103 Over Marelli and Johnson

Claims 1, 4, 5, 8-13 and 16-18 are rejected under 35 USC 103(a) as being unpatentable over U.S. Patent No. 6,164,494 to Marelli (“Marelli”) in view of U.S. Patent No. 3,655,952 to Johnson et al. (“Johnson”). Applicant respectfully requests withdrawal of the rejection, as a *prima facie* case of obviousness has not been established.

Specifically, neither Marelli nor Johnson, individually or in combination, discloses a counter member being biased towards both a ratchet member and a trigger member. Thus, the claims are not *prima facie* obvious over the cited references. Applicant does not comment further on other features of claim 1, or the claims depending from claim 1, although Applicant does not acquiesce with the assertions regarding those features or claims. Applicant respectfully requests withdrawal of the rejection.

Conclusion

In view of the foregoing, it is submitted that this application is in condition for allowance. Favorable consideration and allowance of the application are respectfully requested. The Examiner is invited to telephone the undersigned if the Examiner believes it would be useful to advance prosecution.

Respectfully submitted,

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Date

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